

In the Drawings:

The attached drawing sheet includes changes to FIG. 1. Please replace the previously submitted FIG. 1 with the attached Replacement FIG. 1. A Submission of Substitute Formal Drawings is also attached.

## **REMARKS**

As a preliminary matter, FIG. 1 is corrected to identify the optical waveguide as reference number 20, instead of 22. Support for this amendment can be found in Applicants' Specification on page 10, line 1 *et seq.*

Claims 1-3 and 27 stand rejected under 35 U.S.C. §102(e) as being anticipated by Kim et al. (U.S. Publication No. 2002/0001184). Applicants respectfully traverse the rejection because Kim fails to disclose (or suggest) a plurality of optical waveguides.

Kim is directed to a stack type backlight assembly and LCD having the same. As shown in FIGs. 1 and 3, the LCD 900 has a mold frame 100 that receives a pair of lamp assembly units 200. A reflector mold 210 has a reflector plate 300 stacked therein such that the reflector plate is formed on the mold frame 100. A single light guiding plate 400 is provided on the reflector plate 300. Diffusion sheets 500 are then mounted on the light guiding plate 400.

In the rejection outstanding, the Examiner asserts that the reflector plate 300, light guiding plate 400, and diffusion sheets 500 correspond to a plurality of optical waveguides. Applicants respectfully traverse this statement of the Examiner. Only a single optical waveguide is disclosed in Kim. Moreover, paragraph [0047] cited by the Examiner in support of this feature merely teaches that a pair of frames 700 are used to restrict vertical movement of the reflector plate 300, stack type lamp assembly 200, light guiding plate 400, and diffusion sheets 500. No plural light guiding plates are taught in this cited portion of Kim, and Applicants can find no support for this assertion in the remaining portions of the reference.

In contrast, as shown in the corrected drawing sheet of FIG. 1 of the present Application, a plurality of optical waveguides 20, 21 are stacked on each other. As further shown in FIG. 2, the optical waveguide 20 has a diffusion reflecting layer/surface 30a and another diffusion reflecting layer/surface 30b that cause light emitted from the cold-cathode tubes 22a, 22b to be emitted from the light-emitting areas A1, B1. Similarly, the optical waveguide 21 has diffusion reflecting layers/surfaces 31a, 31b that cause the light from the cold-cathode tubes 23a, 23b to be emitted from the light-emitting areas A2, B2.

As further shown in FIG. 2, the diffusion reflecting layers 30a, 31a, 30b, and 31b are stacked such that a plurality of light-emitting areas A1, A2, B1, and B2 are disposed almost complimentary when viewed in a direction vertical to the light emission surface 28. Kim fails to disclose or suggest a plurality of optical waveguides, with each waveguide having a light diffusion reflecting surface for diffusing and reflecting guided light, and a light emission surface for emitting the diffused and reflected light, in a manner wherein a plurality of light-emitting areas in which the light diffusion reflecting surfaces formed are separating from each other. For at least this reason the rejection is improper, and should be withdrawn which is respectfully requested.

Moreover, the plurality of optical waveguides are stacked such that the plurality of light-emitting areas A1, A2, B1, and B2 are disposed almost complimentary when viewed in a direction vertical to the light emission surface 28. Additionally, each of the optical waveguides includes a plurality of light sources disposed at ends of the respective waveguides. For the reasons above, and also because Kim fails to disclose or suggest multiple optical waveguides, or to have a

plurality of light sources at ends of each of the optical waveguides, withdrawal of the §102(e) rejection of claims 1-3 and 27 is respectfully requested.

Claim 4 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Kim in view of Beeteson (U.S. Patent No. 5,796,382). In response, Applicants traverse the rejection for the reasons recited above with respect to the rejection of independent claim 1. Since claim 4 depends upon claim 1, it necessarily includes all of the features of claim 1 plus other additional features. Thus, Applicants submit that the §103(a) rejection of claim 4 has also been overcome for the same reasons mentioned above to overcome the rejection of independent claim 1, and also because Beeteson fails to overcome the deficiencies of Kim.

Beeteson is merely cited for teaching a light source control system for sequentially intermittently turning on a plurality of light sources. Beeteson fails to disclose or suggest a plurality of optical waveguides that reflect guided light such that a plurality of light-emitting areas are formed. For this reason, Applicants respectfully request that the §103(a) rejection of claim 4 also be withdrawn.

For all of the foregoing reasons, Applicants submit that this application is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

GREER, BURNS & CRAIN, LTD.

**Customer No. 24978**

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300 South Wacker Drive

Suite 2500

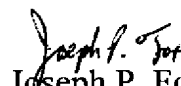
Chicago, Illinois 60606

Telephone: (312) 360-0080

Facsimile: (312) 360-9315

P:\DOCS\1324\70221\CSI836.DOC

By:



Joseph P. Fox

Registration No. 41,760

